

# W5YI

## America's Oldest Ham Radio Newsletter REPORT

Up to the minute news from the world of amateur radio, personal computing and emerging electronics. While no guarantee is made, information is from sources we believe to be reliable.

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### FCC Adopts Rules to Implement Universal Licensing System

The FCC released the long awaited Universal Licensing System (ULS) *Report and Order* on October 21, 1998. The final Order comes 8 months after the *Notice of Proposed Rulemaking* was adopted. ULS looks toward consolidating, revising, and streamlining the license application procedures for all radio services licensed by the Wireless Telecommunications Bureau (WTB) including the Personal, Commercial and Amateur Radio Services.

The rule changes will enable the FCC to fully implement the Universal Licensing System, the Commission's new automated licensing system and integrated database for the wireless radio services. The final consolidated application forms which will enable licensees and applicants to file applications electronically in ULS were issued. Procedures were also established to ensure a smooth transition from the current licensing system to the new Universal Licensing System.

Previously, wireless applicants and licensees used a myriad of forms for the various wireless services and the information provided on these applications has been collected in separate databases, each for a different group of services. Although in some instances, these forms could be filed electronically, many of the existing systems did not accommodate electronic filing, instead requiring information to be submitted on paper and then manually keyed into the database by FCC staff.

The Wireless Bureau has already begun the

phased in transition of licensing data for each of the existing wireless services from their present databases to ULS, after which all future licensing activity in each service will be in ULS. The FCC anticipates that ULS will be fully operational in all wireless services by summer 1999. The Amateur Service will be one of the last services to come under the ULS since it is already filing electronically.

ULS will also enhance the availability of licensing information to the public, which will for the first time have access to all publicly available wireless licensing information on-line over the Internet.

The FCC has taken steps to protect both system integrity and the confidentiality of information pertaining to applicants and licensees. To ensure the integrity of the licensing process, the FCC has initiated a registration process in which wireless applicants and licensees can register their Taxpayer Identification Numbers (TINs), self-assign a password, and then associate all of their call signs with the registration ID. All electronic filing transactions will occur on the FCC's wide area network through a direct connection, so that application data will not be transmitted on the Internet, which is less secure. Once data has been entered into ULS, sensitive data such as Social Security Numbers (SSN) will not be accessible to the public.

All wireless radio service licensing rules (including those of the Amateur Service) have now been incorporated in a single section of Part 1.

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The ULS proceeding has been designated as part of the 1998 Biennial Review of regulations which no longer in the public interest. The FCC received 77 comments and 17 reply comments in response to the *ULS Notice of Proposed Rulemaking* issued last February. In addition, the FCC held several open forums on ULS for the public and for industry representatives, which yielded many insightful comments and suggestions. The FCC substantially adopted the proposals set forth in the *ULS NPRM*.

- Four consolidated ULS application forms for wireless services were approved to replace approximately 41 application forms currently in use. These are FCC Form 601, 602, 603 and 605.
- The Quick Form 605 will be used in the Ship, Aircraft, Amateur, Restricted/Commercial Radio Operator, and the General Mobile Radio Services ...services which are not required to provide extensive technical data to obtain a license.
- The FCC will allow the continued use of existing (pre-ULS) forms for a transition period of six months after the effective date of these rules. This transition period will provide for the orderly transition from the use of old forms to the use of new ULS forms. The FCC said "...applicants could begin using the new ULS forms sooner if they prefer, and we encourage them to do so."
- Electronic filing for applicants in services that are licensed by auction will be mandatory, but electronic filing will be optional for applicants and licensees in services that are not subject to licensing by auction.
- Electronic filing will be mandatory for all applications filed by volunteer examiner-coordinators (VECs) in the Amateur service. The ARRL contended that mandatory electronic filing would stand as a barrier to access for many Amateur licensees. These requirements will take effect on July 1, 1999, or six months after the FCC begins use of ULS in a particular service, whichever is later.
- All rules governing the filing and processing of applications for wireless services have been consolidated into a single set of rules in Part 1.
- The FCC will require the submission of a Taxpayer Identification Number (TIN) by applicants and licensees using ULS, consistent with the requirements of the *Debt Collection Improvement Act of 1996*. For an amateur radio operator, the TIN will be the applicant's Social Security Number. In all cases, TIN information will be kept confidential so that no unauthorized person will have access to the information.
- The Commission adopted the proposals made in WT Docket 96-188 to authorize reciprocal operation by foreign amateur radio licensees by rule pursuant to recent international reciprocal operating agreements.
- In addition, numerous GMRS rules are being eliminated and streamlined as duplicative or unnecessary.

## Commercial Radio Operator License Requirements

Currently, applicants seeking commercial radio operator licenses must pass one or more written examinations administered by a Commission-certified Commercial Operator License Examination (COLE) Manager and obtain a proof of passing certificate (PPC). The FCC adopted rules allowing new licenses, renewals and modifications to be handled as per the current procedures. Alternatively, the applicant or his agent may file electronically using FCC Form 605. For a new license, the applicant must file Form 605 and mail the PPC to the processing office in Gettysburg, Pennsylvania. For renewals, the applicant need only file Form 605, since no attachments are required. "We want to make it clear that in announcing the above rules, we are not mandating electronic filing for Commercial Radio Operators, rather we are strongly encouraging it in the belief that the public interest is best served by this practice. In addition, we will consider in a future proceeding more efficient methods of verifying PPCs other than manual submission."

## Reciprocal Operation by Foreign Amateur Operators

In the *ULS Notice*, the FCC asked for comment on whether foreign amateur radio operators should have reciprocal operation authorized by rule. Currently, in order to obtain an alien amateur reciprocal permit, the visitor must apply using FCC Form 610-A. No test or other standard is required of these applicants other than that they possess a license from their country of citizenship. There is no fee. Accordingly, the FCC-issued permit merely confirms that holders of such permits also hold a license from their country of citizenship and that the U.S. has a reciprocal treaty agreement with their country.

The FCC proposal to authorize reciprocal operation by rule would eliminate the need for foreign citizens to file Form 610-A and receive an additional permit from the U.S. In addition, in the *ULS Notice* we sought comment on whether the Commission should accept the services of any organizations for the purpose of providing Club, Military Recreation and Radio Amateur Civil Emergency Services (RACES) station call signs that meet the minimum requirements set forth in the *Communications Act*, and that complete a pilot electronic autogram batch filing project similar to that completed by the 14 Volunteer-Examiner Coordinators (VECs).

The Commission said "In an earlier proceeding, we had proposed to amend the Amateur Service Rules in order to facilitate implementation of two international reciprocal operating arrangements -- the *European Conference of Postal and Telecommunications Administrations* (CEPT) radio-amateur license, and the *Inter-American Convention on an International Amateur Radio Permit* (CITEL/Amateur Convention). Comments to the *CEPT-CITEL NPRM* indicate that these operating arrangements

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are desired by amateur operators who want to operate their stations during international travel without first obtaining a permit from each country visited."

"After reviewing the comments we have received to both the *CEPT/CITEL NPRM* and the *ULS Notice*, we conclude that all alien amateur radio reciprocal operation should be authorized by rule. As we proposed, however, this decision does not permit any citizen of the United States to operate under this procedure on the authority of a second citizenship and an amateur license from another country. Our decision herein is supported by most commenters, who generally agree with the concept of authorization by rule of reciprocal operating privileges by persons holding a CEPT radio-amateur license issued by a participating CEPT country, or an *International Amateur Radio Permit* (IARP) issued under the authority of a participating CITEL country. Citizens of CEPT and CITEL countries that are visiting the United States as tourists, attendees at conferences, students and visiting professors, for example, would benefit from having a convenient procedure available whereby they could operate their amateur stations while here in the United States. Additionally, United States citizens who travel in Europe or in the Americas for short visits would similarly benefit."

"In authorizing by rule CEPT licensees and CITEL licensees to operate from locations where the amateur service is regulated by the FCC, the Commission's rules also must specify the operating privileges granted and the station identification requirements. The operating privileges should be consistent with the two classes of CEPT radio-amateur licenses, and IARPs. Class 1 licenses requires knowledge of the international Morse code and carries all operating privileges. It is, therefore, similar to our Amateur Extra Class. Class 2 licenses do not require knowledge of telegraphy and carries all operating privileges above 30 MHz. A Class 2 license, therefore, is similar to our Technician Class operator license. Class 1 operators, therefore, are authorized the frequency privileges of Amateur Extra Class operators. Class 2 operators will receive the frequency privileges of Technician Class operators. For station identification purposes, when the station is transmitting under the authority of a CEPT radio-amateur license, or an IARP, an indicator consisting of the appropriate letter-numeral designating the station location must be included before, after, or both before and after, the call sign issued to the station by the licensing country."

"For a United States citizens to operate an amateur station in a CEPT country, certain requirements of the *CEPT European Radio Committee* (ERC) must be met for participation by non-CEPT Administrations. Under the CEPT Agreement, to activate operating authority, a traveler would have to carry credentials in English, French and German that the person, if a U.S. Citizen, and if a Commission-authorized amateur operator, is entitled to certain amateur station operating privileges in the specific coun-

tries that have implemented the CEPT Agreement. For this purpose, we intend to rely upon: (1) a public notice containing the above information; (2) proof of Commission-authorization to operate; and, (3) proof of U. S. citizenship."

"For a United States citizen to operate an amateur station in a CITEL country, an International Amateur Radio Permit (IARP) is necessary. According to the CITEL Agreement, the IARP may be issued by the home administration. Such issuance of the IARP by the home administration may also be delegated to a member-society of the *International Amateur Radio Union* (IARU). The ARRL has offered its services to the Department of State to issue the IARP document to U.S. citizens for their use when they travel to CITEL countries. The ARRL would provide this service on a non-discriminatory basis, and at no cost, charge or expense to the United States Government. We have no objection to the mechanism that ARRL wishes to establish for the issuance of the IARP document to U.S. citizens. Details of this mechanism can be worked out between the ARRL and the Department of State. In the future, the Commission may delegate to other entities the authority to issue the IARP."

"We note that authorization by rule of CEPT and CITEL licensees merely follows our long-standing precedent permitting Canadian citizens, who hold a license from their home country, to operate an amateur station in the United States without any further authorization or documentation. We conclude that authorization by rule of CEPT and CITEL licensees would be in the public interest and would benefit foreign visitors to the United States. In accordance with the procedures discussed above, United States citizens who travel abroad to Europe and to countries in Latin America would benefit equally."

"With respect to our specific proposal to authorize reciprocal operation by rule in the *ULS Notice*, the American Radio Relay League, Inc. (ARRL) is concerned about proposed section 97.25(b) of the Rules, which would eliminate the one-year term for an alien reciprocal permit. We note, however, that this limitation serves no regulatory purpose or benefit since our current rules permit alien amateur radio operators to reapply for new permits indefinitely. Further, we observe that most visitors with reciprocal permits operate only temporarily in the United States and that they are not authorized under the Commission's rules to use more permanent, sophisticated systems such as beacons, repeaters, and auxiliary stations. Accordingly, we believe that retention of the one year limitation would perpetuate unnecessary regulation. Moreover, the rule we adopt here is similar to the one that governs operation by Canadian citizens. In that instance, we believe that reciprocal operation authorized by rule has not encouraged Canadian permittees to operate in the United States permanently."

Section §97.3 of the Part 97 rules has been

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amended to provide for three new "Definitions." They are:

**CEPT radio-amateur license.** A license issued by a country belonging to the European Conference of Postal and Telecommunications Administrations (CEPT) that has adopted Recommendation T/R 61-01;

**IARP. International Amateur Radio Permit.** A document issued pursuant to the terms of the Inter-American Convention on an International Amateur Radio Permit by a country signatory to that Convention, other than the United States.

**ULS (Universal Licensing System).** The consolidated database, application filing system and processing system for all Wireless Telecommunications Services.

## Club and Military Recreation station call signs

"ARRL also raised the issue of license documents. Currently, an amateur service license is granted when the licensing data is entered into the Commission's licensee data base, not when the applicant receives the paper document. The ARRL maintains, however, that the paper license is a non-replaceable necessity which establishes certain entitlements. While we appreciate ARRL's concerns, we are not willing to reassess this settled issue."

"In our *Amateur Licensing MO&O*, we reiterated that 'operation is authorized when the grant of the license has occurred (emphasis added).' We believe that this procedure affords several benefits overlooked by the League. Most importantly, it provides authority to the licensee to undertake operations almost immediately. Once the applicant's license grant is posted on the web site, the licensee is authorized to start operating immediately, without having to wait for a paper document. This procedure will reduce the wait for a licensee from several months to a matter of days. Finally, we note that presently VECs and other entities have authority to acknowledge an entry in the Commission's database by issuing a paper document to the licensee, based on information downloaded from the Commission's database."

"ARRL further opposes our proposal to use certain eligible private sector entities, on a volunteer, uncompensated and unreimbursed basis, for the issuance of Club and Military Recreation station call signs. It questions our reinstating the administrators for these stations after vacating the rules in a previous Commission action. In that action, the Commission established call sign administrators for Club and Military Recreation Stations. Upon reconsideration, however, the Commission vacated that action based on procedural grounds, stating that the matter should have been a rule making proceeding rather than adoption of final rules by order. We continue to believe that the use of call sign administrators would alleviate the Commission's burden of processing applications for Club and Military Recreation stations. By including call sign administration within the ULS electronic filing we believe

the licensing process will become more efficient and cost-effective. Therefore, we will accept the services of any organizations that meet the requirements of Section 4(g)(3)(B) of the *Communications Act*."

## General Mobile Radio Service Streamlined

GMRS, a Part 95 Personal Radio Service, was originally established as the Citizens Class A Radio Service, and was allocated for use by individuals and entities who were not eligible for licensing in the public safety, industrial, and transportation services.

The FCC has now identified and eliminated or streamlined numerous GMRS rules. Many commenters viewed the *ULS Notice* as an effort by the Commission to fundamentally alter the purpose or form of the GMRS. The Commission did not agree. "...we have not altered eligibility requirements, permitted communication, the frequency allocation or other rules that could fundamentally alter the purpose of GMRS," FCC said. "Further, we believe the effect of these rule changes will actually increase users' flexibility in using GMRS and will promote use of the service."

Currently, a GMRS licensee may use seven 462 MHz interstitial channels, the 426.675 MHz/467.675 MHz nationwide channel pair for emergency communications and traveler assistance, and up to two of seven other GMRS channel pairs. The GMRS licensee is able to choose which channels will be authorized on the license. GMRS stations will now be permitted to transmit on all seven authorized channels. This will permit GMRS users to use the best channel available for its stations at any given time or place. "All-channel operation will also relieve the public and the Commission of unnecessary regulatory burdens. Currently, we routinely grant channel requests without further evaluation or inquiry," FCC added.

The FCC also abolished the rule limiting the use of the 467 MHz channels for transmissions through repeaters and imposed a fifteen watt limit on GMRS fixed stations. Small base stations will continue to be restricted to five watts. Permissible and prohibited communications will be stated in the rules. "We will also retain a prohibition on advertisements for the sale of services. Finally, we remove the prohibition on sounds only to attract attention." Other rule sections, such as those pertaining to system records, station control point and controlling stations from a remote point, and servicing and modifying station transmitters were also removed from the rules as being unnecessary.

The FCC's *Office of Management and Budget* still has not approved the new FCC Form 605. The new rules become effective sixty days after publication in the *Federal Register* — about year end. The FCC's ULS webpage can be accessed at <<http://www.fcc.gov/wtb/uls/>>. The full ULS Report and Order - nearly 500 pages worth - is available at the FCC's website: <<http://www.fcc.gov/>>.

Quick-Form Application for Authorization in the Ship, Aircraft,  
Amateur, Restricted and Commercial Operator, and the  
General Mobile Radio ServicesApproved by OMB  
3060 - xxxx  
See instructions for  
public burden estimate

1) Radio Service Code:

## Application Purpose (Select only one) ( )

2)	NE - New MD - Modification AM - Amendment	RO - Renewal Only RM - Renewal/Modification CA - Cancellation of License	WD - Withdrawal of Application DU - Duplicate License AU - Administrative Update
3)	If this request is for a STA (Special Temporary Authorization) enter 'S' attached the required exhibit as described in the instructions. Otherwise enter N (Not Applicable).		
4)	If this request is for an Amendment or Withdrawal of Application, enter the file number of the pending		
5)	If this request is for a Modification, Renewal Only, Renewal/Modification, Cancellation of License, Duplicate License, or Administrative Update, enter the call sign of the existing FCC license. Attach additional sheets if		
6)	Does this filing request a Waiver of the Commission's rules? If 'Y', attach the required showing as described in the instructions.		
7)	Are attachments (other than associated schedules) being filed with this application?		

## Applicant Information

8a) Taxpayer Identification Number:	8b) SGIN:		
9) Applicant/Licensee is a(n): ( ) Individual Corporation	Unincorporated Association Limited Liability Corporation	Trust Partnership	Government Entity Joint Venture Consortium
10) First Name (if individual):	MI:	Last Name:	Suffix:
11) Entity Name (if other than individual):			
12) Attention To:			
13) P.O. Box:	And/Or	14) Street Address:	
15) City:	16) State:	17) Zip:	
18) Telephone Number:	19) FAX:		
20) E-Mail Address:			

## Fee Status

21) Is the applicant exempt from FCC application fees?	( ) Yes No
22) Is the applicant exempt from FCC regulatory fees?	( ) Yes No

## General Certification Statements

- 1) The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application.
- 2) The applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
- 3) Neither the Applicant nor any member thereof is a foreign government or a representative thereof.
- 4) The applicant certifies that neither the applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.
- 5) Amateur or GMRS Applicant certifies that the construction of the station would NOT be an action which is likely to have a significant environmental effect (see the Commission's Rules 47 CFR Sections 1.1301-1.1319 and Section 97.13(a)).
- 6) Amateur Applicant certifies that they have READ and WILL COMPLY WITH Section 97.13(c) of the Commission's Rules regarding RADIOFREQUENCY (RF) RADIATION SAFETY and the amateur service section of OST/OET Bulletin Number 65.

## Certification Statements For GMRS Applicants

- 1) Applicant certifies that he or she is claiming eligibility under Rule Section 95.5 of the Commission's Rules.
- 2) Applicant certifies that he or she is at least 18 years of age.
- 3) Applicant certifies that he or she will comply with the requirement that use of frequencies 462.650, 467.650, 462.700 and 467.700 MHz is not permitted near the Canadian border North of Line A and West of Line C. These frequencies are used throughout Canada and harmful interference is anticipated.

### Signature

23) Typed or Printed Name of Party Authorized to Sign

First Name:	MI:	Last Name:	Suffix:
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24) Title:

Signature:	25) Date:
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Failure To Sign This Application May Result In Dismissal Of The Application And Forfeiture Of Any Fees Paid

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Schedule for Additional Data in the  
Amateur Radio Service

Part 1: AMATEUR STATION CALL SIGN CHANGE AND VANITY CALL SIGN REQUEST

Systematic Call Sign Change

- 1) Is this a request to change a station call sign systematically?  Yes  No

Vanity Call Sign Change

- 2) I hereby apply for a vanity call sign under the following eligibility: (make an 'X' in the appropriate box and enter the required information):

A)	FORMER PRIMARY STATION HOLDER: I request call sign _____ be shown on my primary station license. This call sign was previously shown on my primary station license.
B)	CLOSE RELATIVE OF FORMER HOLDER: I request call sign _____ be shown on my primary station license. This call sign was previously shown on the primary station license of my deceased spouse, child, grandchild, stepchild, parent, grandparent, stepparent, brother, sister, stepbrother, stepsister, aunt, uncle, niece, nephew, or in-law. Enter the deceased relationship to you: _____
C)	FORMER CLUB STATION HOLDER: I request call sign _____ be shown on the license for the club station, for which I am the license trustee. This call sign was previously shown on the license for this club station.
D)	CLUB STATION WITH CONSENT OF CLOSE RELATIVE OF FORMER HOLDER: I request call sign _____ be shown on the license for the club station, for which I am the license trustee. This call sign was previously shown on the primary station license of a person now deceased. I am acting with written consent of the deceased person's spouse, child, grandchild, stepchild, parent, grandparent, stepparent, brother, sister, stepbrother, stepsister, aunt, uncle, niece, nephew, or in-law. Enter the deceased relationship to the person giving consent _____.
E)	PRIMARY STATION PREFERENCE LIST: I request the first assignable call sign from my preference list in item #3 be shown on the license for my primary station.
F)	CLUB STATION PREFERENCE LIST: I request the first assignable call sign from my preference list in item #3 be shown on the license for the club station, for which I am the license trustee.

Vanity Call Sign PREFERENCE LIST

- 3) Select your preference list of vanity call signs very carefully. Give exact prefix, numeral, and suffix for each call sign.

1)	6)	11)	16)	21)
2)	7)	12)	17)	22)
3)	8)	13)	18)	23)
4)	9)	14)	19)	24)
5)	10)	15)	20)	25)

Note: If none of the call signs you selected are assignable, you will retain your existing call sign.

Schedule for Additional Data in the  
Amateur Radio Service

Approved by OMB  
3060 - xxxx  
See 605 Main Form Instructions  
for public burden estimate

Part 2: Physician's Certification of Disability

TO BE COMPLETED BY PHYSICIAN			
<b>PHYSICIAN'S CERTIFICATION OF DISABILITY</b>  Please see notice below	Print, type, or stamp physician's name:		
	Street address:		
	City, State, ZIP code:		
	Office telephone number:		
<b>I CERTIFY THAT</b> I have read the Notice to Physician Certifying to a Disability, and that the person applying for the license is severely handicapped, the duration of which will extend for more than 365 days beyond this date. Because of this severe handicap, this person is unable to pass a 13 or 20 words per minute telegraphy examination. I am licensed to practice in the United States or its Territories as a doctor of medicine (M.D.) or doctor of osteopathy (D.O.). I have considered the accommodations that could be made for this person's disability and have determined that, even with accommodations, this person would be unable to pass a 13 or 20 words per minute telegraphy examination. <b>WILLFUL FALSE STATEMENT IS PUNISHABLE BY FINE AND IMPRISONMENT (U.S. CODE TITLE 18, SECTION 1001)</b>			
<b>PATIENT'S RELEASE</b>		PHYSICIAN'S SIGNATURE (DO NOT PRINT, TYPE, OR STAMP)	M.D. or D.O.      DATE SIGNED
Authorization is hereby given to the physician named above, who participated in my care, to release to the Federal Communications Commission any medical information deemed necessary to process my application for an amateur operator/ primary station license.			
APPLICANT'S SIGNATURE (DO NOT PRINT, TYPE, OR STAMP)      DATE SIGNED			

**NOTICE TO PHYSICIAN CERTIFYING TO A DISABILITY**

You are being asked by a person who has already passed a 5 words per minute telegraphy examination to certify that, because of a severe handicap, he/she is unable to pass a 13 or 20 words per minute telegraphy examination. If you sign the certification, the person will be exempt from the examination. Before you sign the certification, please consider the following:

**THE REASON FOR THE EXAMINATION** - Telegraphy is a method of electrical communication that the Amateur Radio Service community strongly desires to preserve. We support their objective by authorizing additional operating privileges to amateur operators who increase their skill to 13 and 20 words per minute. Normally, to attain these levels of skill, intense practice is required. Annually, thousands of amateur operators prove by passing examinations that they have acquired the skill. These examinations are prepared and administered by amateur operators in the local community who volunteer their time and effort.

**THE EXAMINATION PROCEDURE** - The volunteer examiners (VEs) send a short message in the Morse code. The examinee must decipher a series of audible dots and dashes into 43 different alphabetic, numeric and punctuation characters used in the message. To pass, the examinee must correctly answer questions about the content of the message. Usually, a fill-in-the-blanks format is used. With your certification, they will give the person credit for passing the examination, even though they do not administer it.

**MUST A PERSON WITH A HANDICAP SEEK EXEMPTION?**  
No handicapped person is required to request exemption from the higher speed telegraphy examinations, nor is anyone denied the opportunity to take the examinations **because of a handicap**. There is available to all otherwise qualified persons, handicapped or not, the Technician Class operator license that does not require passing a telegraphy examination. Because of international regulations, however, any handicapped applicant requesting exemption from the 13 or 20 words per minute examination must have passed the 5 words per minute examination.

**ACCOMMODATING A HANDICAPPED PERSON** - Many handicapped persons accept and benefit from the personal challenge of passing the examination in spite of their hardships. For handicapped persons without an exemption who have difficulty in proving that they can decipher messages sent in the Morse code, the VEs make exceptionally accommodative arrangements. They will adjust the tone in frequency and volume to suit the examinee. They will administer the examination at a place convenient and comfortable to the examinee, even at bedside. For a deaf person, they will send the dots and dashes to a vibrating surface or flashing light. They will write the examinee's dictation. Where warranted, they will pause in sending the message after each sentence, each phrase, each word, or each character to allow the examinee additional time to absorb and interpret what was sent. They will even allow the examinee to send the message, rather than receive it.

**YOUR DECISION** - The VEs rely upon you to make the necessary medical determination for them using your professional judgement. You are being asked to decide if the person's handicap is so severe that he/she cannot pass the examination even when the VEs employ their accommodative procedures. The impairment, moreover, will last more than one year. This procedure is not intended to exempt a person who simply wants to avoid expending the effort necessary to acquire greater skill in telegraphy. The person requesting that you sign the certification will give you names and addresses of VEs and other amateur operators in your community who can provide you with more information on this matter.

**DETAILED INSTRUCTIONS** - If you decide to execute the certification, you should complete and sign the Physician's Certification of Disability on the person's FCC Form 605 Schedule D Part 2. You must be an M.D. or D.O. licensed to practice in the United States or its Territories. The person must sign a release permitting disclosure to the FCC of the medical information pertaining to the disability.

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## AMATEUR RADIO STATION CALL SIGNS

...sequentially issued as of the first of November 1998:

Radio District	Group A Extra	Group B Advanced	Group C Tech/Gen.	Group D Novice
0 (*)	AB0IA	KI0CM	(***)	KC0EJD
1 (*)	AA1UE	KE1KM	(***)	KB1DJB
2 (*)	AB2FV	KG2PI	(***)	KC2EFW
3 (*)	AA3RV	KF3CE	(***)	KB3DDJ
4 (*)	AF4MH	KU4VX	(***)	KG4APJ
5 (*)	AC5RQ	KM5TH	(***)	KD5FMS
6 (*)	AD6HE	KQ6YJ	(***)	KF6TLP
7 (*)	AB7ZN	KK7QM	(***)	KD7DDG
8 (*)	AB8DR	KI8GW	(***)	KC8LDP
9 (*)	AA9WQ	KG9OS	(***)	KB9TOX
N. Mariana	NH0G	AH0BA	KH0HJ	WH0ABJ
Guam	(**)	AH2DH	KH2TXR	WH2ANX
Hawaii	NH7R	AH6PO	KH7PM	WH6DFA
Am. Samoa	AH8R	AH8AH	KH8DM	WH8ABF
Alaska	AL0N	AL7RH	KL0QL	WL7CUY
Virgin Isl.	(**)	KP2CP	NP2KF	WP2AIJ
Puerto Rico	NP3Y	KP3BL	NP3ZS	WP4NOB

- \* = All 1-by-2 & 2-by-1 call signs have been assigned.
- \*\* = All 2-by-1 call signs have been assigned. When all 1-by-2 and 2-by-1 (Group "A") call signs have been assigned, Group "A" (AA-AK-by-2) call signs are next assigned.
- \*\*\*= Group "C" (N-by-3) call signs have now run out in all radio districts. Group "D" (2-by-3) are now being assigned.)

**Note:** New prefix numerals now being assigned in Puerto Rico (KP3/NP3), Hawaii (AH7/KH7) and Alaska (AL0/KL0)

[Source: FCC Amateur Service Database, Washington, DC]

## NEW AND UPGRADING AMATEUR STATISTICS

For the Month of October 1996, 1997 & 1998

License Class	New Amateurs			Upgrading Amateurs		
	1996	1997	1998	1996	1997	1998
Novice	66	40	32	0	2	1
Technician	1451	862	1024	2	1	0
Tech Plus	141	91	122	276	251	222
General	15	20	18	284	268	245
Advanced	3	4	1	238	182	187
Extra Class	9	4	4	176	175	131
Total:	1685	1021	1280	976	879	786
Decrease:	(25.3%)	(39.4%)	+25.4%	(25.0%)	(9.9%)	(10.6%)

## FCC STEPS AMATEUR SERVICE ENFORCEMENT

The commission has examined it's historical approach to amateur enforcement and determined that there is a need to aggressively and systematically address conduct by amateur licensees and non-licensees,

as well as those who violate the rules in other services. Evidence of this may be seen in the growing numbers of enforcement operations being conducted on unlicensed radio users across the country.

Recently the *Compliance and Information Bureau* (CIB) --formerly the *Field Operations Bureau* (FOB) -- assumed complete enforcement authority over the Amateur Service. A proposal has been made by FCC Chairman Kennard that a new Enforcement Bureau be established which will consolidate all of the current bureaus enforcement activities.

The involvement of the ARRL is still an important part of the equation. All Amateur related cases of interference and other procedural matters should first be referred to the Amateur Auxiliary for resolution. Those which the League cannot resolve will continue to be referred to CIB for investigation and resolution.

In the past, enforcement of Amateur rules (Part 97) was the responsibility of the *Wireless Telecommunications Bureau* (WTB) Enforcement Division. Whereas agents from various CIB field offices across the country, with input from the ARRL, would investigate violations, the WTB Enforcement Branch would ultimately decide what action would be taken against the violator.

Having assumed the role of completing an investigation, CIB will then determine what violation has been committed and take appropriate corrective action. The more egregious violations will include the possibility of monetary forfeitures and/or license suspensions, revocations and/or seizures of radio equipment. The FCC's effort is headed up by Riley Hollingsworth, K4ZDH, the CIB's legal advisor for enforcement.

The concentration of the entire enforcement process into one bureau should be a wake-up call to those individuals in the Amateur community who have demonstrated their unwillingness to abide by the rules. Their abuse of the privilege will no longer be tolerated. CIB resources, including the High Frequency Direction Finding (HFDF) Operations Center in Columbia, Maryland, together with a demonstrated will to enforce communications laws has already begun to make life uncomfortable for them.

A case in point is the recent inspection and close-down of James C. Thompson (KA2YBP) in Waretown, NJ for the alleged intentional jamming the ANARC net on 7240 KHz by rebroadcasting a local commercial AM station while the net was meeting. On Sunday, October 18<sup>th</sup>, Agents from the Philadelphia District Office of CIB were able to locate and observe Mr. Thompson while he was involved in the alleged jamming activity.

On October 21, 1998, Mr. Thompson was issued an official *Notice of Violation* and an order restricting him from operating in the 40 meter band until further notice. Other penalties provided for this type of activity include monetary forfeiture, suspension/revocation of amateur radio privileges and seizure of radio equipment.

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## CUTTING EDGE TECHNOLOGY

■ One of the most powerful computers ever imagined will soon simulate the behavior of the Earth's atmosphere and oceans in high resolution. "Virtual Earth" is not a video game but a serious undertaking of studying the environment. Engineers at NEC plan to run Earth Simulator at over 32 trillion floating-point operations per second. Thousands of microprocessors will run simultaneously. Data from satellites and other sources should help scientists model the weather more accurately.

■ The Intel 4004 -- the world's first microprocessor -- was released in 1971 and had only 16 pins. One of Intel's latest and most powerful models, the Pentium Pro, contains 387 pins! This is because of the wider address and data buses and more input/output control lines.

■ A 5,000-volt power supply only five millimeters thick? It's true. American High Voltage's Millenium 2000 Series devices come in a range of handheld sizes and power capabilities. They use pulse-width modulation technology and DC input voltages from 3.3 to 28 volts.

■ The FoneCam is a digital camera that can be used in a remote location for teleconferencing. Rather than hard-wiring it to your PC, you simply plug it into the nearest telephone jack. That's how it connects to the PC. It doesn't offer full-motion video, simply still pictures sent over the modem at 14.4 K-bit/sec.

## ELECTRONICS IN THE NEWS

■ At certain times of the year, the Earth in its orbit travels into regions of space populated by millions of micrometeorites. This is debris left behind by comets in their orbits. The result of micrometeorites hitting the Earth's atmosphere creates meteor showers, which we can easily see from the ground. The Leonid meteor shower, due to reach maximum intensity this year on Nov. 17<sup>th</sup> is predicted to be particularly intense, causing considerable dismay throughout the aerospace and telecommunications industries. Spacecraft and satellites have no protection from these tiny rocks, which travel faster than a rifle bullet. No one

knows how much damage will occur. To play it safe, the Hubble Space Telescope will be pointed away from the direction of travel for the Leonids, in hopes of protecting the craft's delicate components.

■ Early tests of Motorola's Iridium satellite communications network have not gone well. The service works, but so far tests reveal slow connections. Iridium will sell its satellite service in the U.S. for \$2.50 a minute. Since the Iridium network will span every inch of the globe, they are setting up a multi-lingual customer support system. You can call for immediate assistance in Arabic, both forms of Chinese, French, German, Russian, Japanese, Spanish, and of course English. Iridium will also support over 40 other languages.

In 2000, Iridium will be joined by two more low-earth orbiting (LEO) satellite communications services, Globalstar and ICQ Global Communications. The three systems will need 6 million subscribers to become profitable. Market estimates for satellite-based telephone service range from 20 to 40 million users. Will telephone poles and wire eventually become obsolete? There are 92 million people worldwide on waiting lists for something we all take for granted: basic telephone service.

## COMPUTER STUFF

■ Great Britain has officially announced that Friday, December 31, 1999, will be a national holiday. Although not official (yet) in the U.S., many companies here may give their employees that day off as well. The reason for all this? The Year 2000 computer problem. (It may be a long weekend for those in charge of patching the software, though.)

■ Can you find the stereo speakers? They're hanging right there on the wall. NEC's new Authentic flat-panel speakers are only millimeters thick and need no cabinet. What's more, you can place a picture on top of the surface to make the speaker look just like framed art. Additional uses may include handheld computers and desktop peripherals.

■ JVC offers a CD-ROM duplicator that can copy six discs simultaneously in just 15 minutes -- all without a PC. Just slide in the master and up to six blanks, and you're ready to copy.

■ While you can now save computer files in a remote location through the Internet as a means of backing up software, one must consider how much time that can take. An ordinary tape backup reads and writes bits in parallel, allowing for megabits-per-second speeds. The Internet is simply a fast one-bit-at-a-time information exchange facility. Saving the contents of an entire hard drive in this manner can take hours, not minutes.

■ Get ready for commercial software to include advertising. Soon you may not be able to install a program without seeing a banner for a soft drink on your screen. PKWare, whose PKZip programs have been used to compress files for years, will include animated advertising in the shareware version of its latest update. They say registered and commercially purchased software won't contain any. This may start a trend.

■ A new exercise bicycle incorporates a PC to display realistic-looking scenery as you pedal indoors. The EXERscape uses digital images and sound from a DVD. If you pedal faster, the scenery passes by faster. If you see a hill approaching, the pedal assembly increases its resistance.

■ Computer monitors with shorter depth (length from front to rear) are becoming more popular. They take up less desk space. They supposedly offer brighter images because the shorter CRTs let the electron beam travel a shorter distance. Flat-panel color LCD monitors remain too expensive for most users, so upgrades to monitors with a smaller footprint are becoming more common.

■ A new study from Forrester Research says the PC industry will be in for hard times after next year. Beginning in 2000, PC revenues will drop sharply as makers slash prices to strengthen demand and corporate buyers turn to cheaper Internet appliances. The average price of a PC is already down to \$1,100. It was \$2,000.

■ The fastest growing PC makers are the ones that sell direct ...especially Dell and Gateway. Dell is now the No. 2 PC maker in the U.S. ...and No. 3 worldwide (behind Compaq and IBM.) They sell \$5 million a day from their Web site at <<http://www.dell.com>>...about 20% of their annual \$12 billion volume. Dell's online goal is 50% of sales. While 80% of their volume goes to business-oriented

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customers, sales from their Web site are evenly split between consumers and business users.

■ The long-delayed next version of Microsoft's high-end Windows NT operating system software now has a new name: Windows Professional 2000. And the successor to Windows 98 will be called Windows Consumer 2000. Windows NT (the NT stands for new technology) was first introduced in 1993 for higher-end business computers such as workstations and the servers that run computer networks. The latest version is 4.0.

## INTERNET NEWS

■ What's called the next-generation Internet, the Internet-2, is already being developed. Several California universities are installing a new digital network capable of delivering 2.4 gigabits of data (equivalent to an entire encyclopedia) every second.

■ For some students, academic cheating is now easier than ever, thanks to the Internet. Just search, point, click, and paste and you've completed "your" term theme paper. They don't always get away with this, of course. You don't become a college professor without using your brain cells. Not only do these fake works often contain dramatic shifts in content and writing style, but some teachers have written their own software to compare students' works against others to check for similarities.

■ What are people doing online? The sixth annual Interactive Media Study commissioned by Advertising Age (an industry trade publication) found:

**Services used: 1997: 1998:**

Send E-Mail	35.7%	50.5%
Use Web	30.2%	44.7%
Have Online Svc.	30.1%	43.6%
Use CD-ROM	37.4%	49.2%

**Activity online: 1997: 1998:**

Gather news/info	87.8%	91.2%
Send e-mail	83.2%	88.2%
Conduct research	80.5%	79.4%
Use search engine	35.7%	73.0%
Surf the Web	75.3%	68.5%
Shop	17.8%	26.8%
Post to bb's	30.0%	22.7%
Play games	33.7%	21.8%
Chat online	30.8%	18.4%

29.1% of PC users have purchased online:

**Why you haven't: 1997 1998**

Security concerns	65.7%	71.6%
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**What do people buy online?**: Travel (including air, hotel, car rental), PC hardware/software and consumer electronics.

Online consumer sales of \$6 billion (projected) in 1998 will increase to \$40.6 billion five years from now. The biggest online sales gainer? Grocery shopping will grow \$6.6 billion in 2002.

## WASHINGTON WHISPERS

■ House Republicans have asked the Justice Department to investigate the FCC's move to the Portal's development in Southwest Washington. They especially want to know about the \$1 million in fees paid by the Portal's developer to the manager of the Clinton 1996 re-election campaign. Meanwhile, the FCC is going ahead with the move and the Commission expects to complete its relocation within six months.

On November 2<sup>nd</sup>, the Commission's Office of the Secretary became the first to move to the new Portal's Office building. The new FCC headquarters address is: The Portals, 445 Twelfth St., S.W., Washington, DC 20554. Any filings (such as mailed comments on Amateur Service restructuring) sent to the previous address will still get there, since the 20554 zip code (which both the old and new addresses share) is used for FCC mail only. The FCC prefers, however, that they be mailed to the new address.

## AMATEUR RADIO

■ First Amateur Radio digital ATV test deemed a success — Professor Uwe Kraus, DJ8DW and his ham radio group succeeded in transmitting first moving color pictures with sound using a digital amateur television link. The September 9th transmission was made over a distance of 100 km with 2 MHz bandwidth on 434 MHz. The transmitter was located near Cologne, Germany. It sent 44 seconds of a car race from a Video-CD using directional antennas to a receiver at Someren in the Netherlands. Unlike analog television, the digital video was received clearly in spite of rainy conditions along the signal path.

■ Radio talk show host Art Bell, W6OBB, who mysteriously announced on October 13<sup>th</sup> that he was quitting his syndicated radio program returned to the air on October 28th. Bell, 51 said he was forced to retire from the show due to "life threatening terrible event" which occurred to his family. He would not elaborate on what it was, saying only that it was a private matter. His radio show, "Coast to Coast", broadcast from the small town of Pahrump, Nevada, is the nation's most popular late night talk show. It is carried on 400 radio stations and reaches 15 million listeners. Bell would only say that the network stepped in and helped him, making possible his return.

■ You can find all FCC rules in PDF format for all radio services at: <<http://www.fcc.gov/Bureaus/Engineering-Technology/Documents/cfr/oct1997/>> And the IARU Administrative Council report stating that manual CW should be a "Mandatory Recommendation" is at: <<http://www.iaru.org/rel981005.html>>

■ At a special October 24<sup>th</sup> meeting of the ARRL Directors, the Board reaffirmed that they believed that Amateur Service should have four license classes which would correspond to the Technician, General, Advanced and Amateur Extra class. The Novice and Tech Plus license classes would be eliminated. The General Class would require 5 WPM code proficiency and 12 WPM for the Advanced and Extra Class.

The special ARRL Board meeting was called to consider the League's comments on the FCC's amateur licensing "streamlining" proposals in WT Docket No. 98-143, released in August. Comments are due on the FCC's rulemaking proposal on December 1, replies: January 15.

In a new position, however, the ARRL Board said No-Code Technicians should get 200 watt maximum CW privileges on the General Class bands 80 through 10 meters (but not 160 meters) without any testing at all. The Board's rationale is that anyone who can conduct a CW QSO, has already "...proved that he/she is able to send correctly by hand and to receive correctly by ear, texts in Morse code signals." as required by the International Radio Regulations.

[Editor's Note: This is certainly new and confusing to us! Why have both 5 and 12 wpm CW examinations if QSOs by untested applicants meets the international requirements? No country in the world

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has ever taken a position that just operating CW without testing meets the international manual-CW proficiency requirement. It does not seem logical to permit CW operation without a code exam and then require Morse code testing when the applicant wants to operate in the 'Voice mode'. Furthermore, Technicians would be able to use "keyboards" -- PC software that "reads" Morse without knowing Morse code. That does not seem to meet the international treaty requirement which requires "...sending by hand and receiving correctly by ear..." Will computerized CW replace manual Morse on the HF ham bands? It could, and probably should.]

The ARRL also reverted to the current license class naming system, i.e. Technician, General, Advanced and Extra. The League had first proposed that the license class names should be A, B, C and D.

Multiple choice Morse exams would be banned. Only answering 7 out of 10 fill-in-the-blank questions or one minute solid copy would be permitted.

The ARRL says the Technician and General Class written examinations should contain 35 questions. The Advanced Class 40 and Extra, 50.

ARRL Executive Vice President David Sumner, K1ZZ said that "The [League's] July plan eliminated the HF door by eliminating the Novice. This is, in effect, a replacement for the Novice, but without an additional license class."

Addressing the Morse code requirement in the international Radio Regulations, Sumner summed up the Board's position by saying that "...the new privileges would amount to self-testing. By their very nature, you can't use the privileges until you know the code," he said.

[Editor's note: Actually, the FCC plan did not abolish the 5 WPM code test and Technician Class amateurs would have been able to operate CW once they passed a 5 WPM code test and received a CSCE. Apparently the ARRL was not aware of that.]

The Board affirmed its proposals in RM-9196 to improve the procedures for granting Morse code exam credit on the basis of a physician's certification of a disability.

The Board also supported retention of the topic definitions to be included in written exams, as contained in §97.503(c) of the FCC rules, with some modification to accommodate the new four-class structure.

The Board reaffirmed its desire that

Advanced class volunteer examiners be permitted to administer General class exams, and it renewed its request in RM-9115 for several rules changes involving RACES stations.

The Board noted that it had "...heard and considered the views of thousands of ARRL members" on the amateur licensing issues raised in both the ARRL and FCC proposals.

■ **SARL says the Morse Code entry requirement into HF ham radio is a liability!** The South African Radio League (SARL) is the national amateur radio society in South Africa. On October 3rd, 1998, the SARL Board unanimously agreed on a new initiative to make the HF bands more accessible to Amateurs by addressing the Morse Code requirement for their Amateur Service.

SARL said that even though the IARU supports the continuation of regulation S25.5, "...there exists no good argument in favor of retaining Morse Code as the only qualifier for Amateurs to have unrestricted access to the HF bands."

S25.5 is the international regulation that requires Morse proficiency when Amateur operation takes place on the high frequency bands.

SARL said it will now support initiatives of a number of other IARU member societies such as the *Radio Society of Great Britain* in overhauling the qualifications for an unrestricted Amateur license.

The society believes the first step in the overhauling process should be the immediate reduction in the Morse Code speed requirement from the present 12 words-per-minute to 5 words-per-minute, which still permits compliance with ITU radio regulation S25.5.

Interestingly, there are three license classes in South Africa. Class A requires 12 WPM code (prefix ZS) to have full HF privileges, while Class B licensees (prefix ZU) need attain only 5 WPM code but are restricted in terms of the bands available, output power and some other minor items. A person who has passed the *Radio Amateur's Examination* (RAE), but has not yet passed a code test may be granted a restricted license (prefix ZR), which entitles him or her to operate only at frequencies of 50 MHz and higher.

This is exactly the same license class lineup and CW requirement that is being suggested by the ARRL for U.S. amateurs. But South Africa says it is not working for them.

President Chris Turner, ZS6GM said "The relaxation (or even abolition) of the Morse Code requirement is not inconsistent with the spirit of the ITU definition of the Amateur Service. If the Amateur Service is to remain relevant in the 21st century, it needs to embrace and encourage the development and use of the newer technologies. Clinging to Morse Code as an entry requirement will impede rather than help this development." A strong statement indeed!

He said SARL "...is aware that these proposals may offend a number of Amateurs, but it believes that its duty lies in promoting the future of the Amateur Service, and therefore we appeal to those who have concerns, to accommodate these necessary changes and help us re-build the Amateur Service for the 21st century."

The full text of the SARL policy statement on Morse code is available at their web site: <<http://www.sarl.org.za/>>

■ **The QCWA Board has taken the following position on Amateur Restructuring.** They recommend three classes of license: (a.) No code Technician, (b.) General: 5 WPM and (c.) Extra: 12 WPM. The Board recommends that Advanced Class holders be "Grandfathered" to Extra. Tech Plus operators licensed prior to 1987 would be "grandfathered" to General.

■ **The maximum fee for Amateur Radio operator license examinations administered under the VE/VEC System will be \$6.49 next year.** This amount is based on a 1.5% increase in the Consumer Price Index (CPI) for the fiscal year ending September 30, 1998. Both the ARRL/VEC and W5YI-VEC test fee will be \$6.45 beginning January 1, 1999.

■ **We are enclosing the revised copy of the FCC Form 605 (Quick Form Application) and the Schedule "D" that applies only to the Amateur Service.** You will note that it does not contain all of the information needed to process new and upgraded applications in the Amateur Service. And much of the data on the 605 applies to other services.

Ira Keltz, of the Commission's ULS task force, told us that the VECs could develop their own "Administering VEs Worksheet" to be used in conjunction with these forms - or could even develop a form that could be used in place of the FCC Form 605, Schedule "D" and the needed VE-VEC worksheet. This internally used form would be submitted by the VE team to the VEC and would not be submitted to the FCC.

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## VECs MEET WITH FCC'S PRIVATE WIRELESS DIV.

On October 21, 1998, National Conference of VEC Chairman Win Guin, W2GLJ and Fred Maia, W5YI, chairman of the VECs Rule's Committee traveled to the FCC's headquarters in Washington, DC to discuss several VEC concerns. The meeting was suggested by Ms. D'Wana R. Terry, Chief of the *Public Safety and Private Wireless Division* at the VEC Conference held this past July.

### Growth in the Amateur Service

It was pointed out that the VECs primary concern was lack of growth in the Amateur Service. Amateur Radio is quite different today than it was ten years ago, we said, when 60 percent of all amateurs held fast code licenses - that is General, Advanced and Amateur Extra Class licenses. It is now less than 40% and continues to decrease. And for the third year in a row, there are less total General, Advanced and Extra Class amateurs than the year before.

The Amateur Service today can be thought of as about one-third "No-Code", one-third "Slow Code" (5 WPM) and one-third "Fast Code" (13 and 20 WPM.) All growth in the Amateur Service over the past five years has come at the no code Technician level. Even though the Technician Class continues to grow, for the first time ever, there are now less total amateurs than the year before. The VECs are administering 55% less examinations than just 4 years ago. Amateur radio needs to be streamlined, simplified, updated and revitalized.

We pointed out that our system with six license classes and eight examinations is the most complicated and complex in the world. We said we believed that the number of license classes could be reduced from six to three, and the number of examinations from eight to four.

There is little difference in the frequency privileges accorded to the Advanced and Extra Class. Except for the code speed, the qualifications are basically the same. The VECs believe that these classes can be combined which would leave us with the Technician, General and Extra Class. The Novice and Advanced Class would be phased out. They could be renewed and modified, but no new licenses would be granted. The Tech Plus Class would be renewed as Technician, but applicants would retain their 5 WPM code credit.

The Technician class examination should contain 50 VHF/UHF- oriented questions from the current Element 2 and 3(A) pool) which would be merged. The General would also contain 50 HF- oriented questions from the Element 3(B) pool) and the Extra would contain 100 technically-oriented questions from the merged Element 4(A) and 4(B) pool)

We said we did not agree that the license class names should be changed nor that the Novice, Tech Plus or Advanced Class should be "grandfathered" to General and Extra without examination. For example: both General and Extra Class cover volunteer examinations

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which are not covered in other examinations.

### Morse Code examinations in the Amateur Service

We pointed out that the Commission should be aware that Morse code is primarily viewed by the majority of the Amateur community as a tradition which must be perpetuated. It is a ritual in that is closely related to "hazing" -- or the "rite of passage"-- into the Amateur Service. Morse code has also been used over the years as a means to control access to the ham bands.

Its use today in the Amateur Service is totally recreational. Requiring Morse proficiency as a licensing provision is not consistent with the Commission's mandate to make radio widely available and to encourage the use of new technologies -- or with the purpose of the Amateur Service.

The fact remains that Morse Code is just another mode which does not deserve special consideration -- and we do not think it should not be the cornerstone upon which the service is built. But it is required by international law. A single 5 WPM code examination, however, meets the international treaty requirements and would eliminate the need to grant medical credit to handicapped amateurs.

The VECs find the proposal by the American Radio Relay League that would require VEC's to obtain and review medical records prior to granting a waiver of the higher speed code examinations unacceptable. The VECs are uncomfortable in getting involved in an examinee's medical history. They are not qualified to review medical records and believe examinees have a right to keep their medical records private and confidential.

The VEC System -- that is, the VEs and the VECs -- are caught in the middle between the applicant who wants to operate HF but sees no reason to learn Morse, the amateur community who believe that traditions and nostalgia are extremely important and the medical profession -- many of whom are not even familiar with (or seem to care) how a disability relates to copying code.

Each group seems to have their own view of Morse code and what constitutes a "handicap" that adversely impacts their ability to copy it.

Another argument we hear is that the ability to learn Morse code identifies a motivated and desirable Amateur. "We see no relationship between Morse knowledge and personal characteristics."

The FCC should insure that the examination elements are appropriate for the types of operation that will be performed by the licensee. It is not logical to require manual Morse proficiency as a licensing requirement when code can be easily copied by machine and there are many new, faster data technologies with automatic error correction that can be used on the high frequency bands. We don't think otherwise qualified individuals should not be precluded from experimenting, communicating or participating in public service on the HF bands

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because of a personal dislike for Morse code.

If the Amateur Service did not exist and was being designed from "ground zero" today, it would not contain a Morse proficiency requirement at all. Perhaps our most compelling reason for wanting a single minimum speed Morse examination is that the mode is a barrier to fuller use of the Amateur Service ...and the higher the speed, the bigger the barrier.

## Written examinations in the Amateur Service

The question pools are revised on a four year cycle by the VECs internal Question Pool Committee (QPC). Since the Amateur community participates in the process, it takes more than a year to complete the question revisions ...to get new study material in the marketplace ...and to introduce new examinations. The newly revised question pool is distributed to the public in digital form on December 1st. We ask license preparation publishers to have the new material available in the marketplace by May. This gives examinees 60 days before the newly revised questions must be used in all examinations.

VECs consider the license preparation publishers to be an important part of the VEC System and we work closely with them. It is very important that there be a smooth transition from the current system to a restructured Amateur Service and that any financial burden be kept to a minimum. We tell the publishers that the questions will remain current for a four year period and they base their activities and quantities on this premise.

At present, the VECs revise five question pools on a four year cycle. We would like to change that to three pools on a three year cycle. The pools would be:

- (1.) A new Element 3(A) consisting of the current merged Element 2 and 3(A) pools. The Technician examination would consist of 50 VHF-oriented questions from a pool of about 500 questions.
- (2.) The current Element 3(B) pool would provide the basis for a 50 question General Class examination. (500 question pool.)
- (3.) A new Element 4 pool would consist of the current merged Element 4(A) and 4(B) pool. The Extra Class examination would contain 100 technically-oriented questions. (1000 question pool.)

We suggested that the next QPC revision completed by QPC would be Element 4 which would be implemented on July 1, 2000. The QPC would work on it during 1999.

We pointed out that we felt it important that the current license class names be retained rather than Class A, B, C or 1, 2, 3. Training aids in the marketplace are identified by the current names. And any change will confuse examinees and would adversely impact publishers and distributors who already have these titles "on the shelves." Although new Novice and Advanced Class licenses would be phased out, these classes would be able to be renewed or modified. We felt it would be un-

wieldy to mix an old and new license class naming system. And using the same license class names would eliminate the need to reissue licenses. Otherwise, it would take 12 years to phase out the old license class naming system which is excessive and confusing.

## Mandating the general topics in written examinations

The Commission asked for comment on whether the ten topics which must be asked in all written examinations should continue to be established in the rules. At present, the QPC must provide a bank of ten times as many questions as will appear on any examination. We said that we believed the primary interest of the Government in the Amateur Service examination process and in the licensing of amateur radio operators is to minimize interference to all users of the radio spectrum, ...to protect health ...and to promote safety? "Yet, many of the questions asked in the ham exams are not related to interference, health and safety."

We asked the FCC if it was important to the Commission that all Amateur radio operators be knowledgeable in such topics as radio wave propagation, circuitry, equipment components, and so forth? Especially since due to their complexity, almost all transmitters today are purchased in the commercial marketplace. Fifty years ago, most ham gear was home constructed.

We said that it seems that applicants increasingly want to use the ham bands for personal, public service and hobby-type communications among their friends, community and family -- rather than as an educational vehicle to enhance their electronics knowledge.

The international law provides for "...self-training, intercommunication and technical investigation." The required question topics in Amateur Service examinations are heavily weighted toward technical matters. "Is it important that beginners know about the internal circuits of their transceiver when they all use commercial equipment?" Overly technical questions also serve to keep the number of Amateur radio operators low. "Questions on electronic circuitry are more appropriate for the higher class operator who is more inclined to experiment."

We said that we believed that the content of the question pools should be left up to the VECs Question Pool Committee. Some of the current topics fail to take changes over the years in operating habits, technology and transmitting equipment into consideration.

There was also a discussion about the Universal Licensing system which I won't go into here since it is covered elsewhere in this newsletter.

The meeting was additionally attended by Bill Cross and Monty DePont from the FCC's Policy and Rules Branch, Herb Zeiler, Deputy Public Safety and Private Wireless Division Chief and Ira Keltz from the task force implementing the new Universal Licensing System. All agreed that the meeting with the VECs was very useful to all concerned.